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IN THE UNITED STATES PATENT AND TRADEMARK OFFICE
BEFORE THE TRADEMARK TRIAL AND APPEAL BOARD

Proceeding	92060308
Party	Defendant Corcamore, LLC
Correspondence Address	CHARLES L THOMASON 55 W 12TH AVE COLUMBUS, OH 43210 UNITED STATES thomason@spatlaw.com
Submission	Other Motions/Papers
Filer's Name	Charles L. Thomason
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Date	12/30/2015
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**IN THE UNITED STATES PATENT AND TRADEMARK OFFICE
BEFORE THE TRADEMARK TRIAL AND APPEAL BOARD**

SFM, LLC,	}	
	}	
v.	}	Cancellation No: 92 060308
	}	
Corcamore, LLC	}	Registration No. 3708453
	}	
Respondent-Registrant.	}	

ELECTRONICALLY SERVED

REQUEST FOR LEAVE TO FILE RECONSIDERATION MOTION.

TO: Nicole M. Murray, Esq.
Quarles & Brady LLP
300 N. LaSalle St., Suite 4000
Chicago, IL 60654
Email: *Nicole.Murray[at]quarles[dot]com*

PLEASE TAKE NOTICE that the Respondent Corcamore LLC moves for leave to request reconsideration of the ruling based upon USPTO Rule 11.18(b), because that rule pertains strictly to that party that has “presented” a “paper,” however that ruling overlooks or misunderstands that respondent did not present the indicated “paper” to the Board, the Petitioner presented it. Moreover, reconsideration will be sought because Rule 11.18 is subject to the notice and due process requirements of Rule 11, FED. R. CIV. PROC. Rule "11(c)(1)(B) requires ... notice of `the specific conduct that appears to violate subdivision (b),' and thus to provide an opportunity for the party to show cause why no sanction for the stated conduct is warranted." *I-10 Indus. Associates, LLC v. United States*, 528 F.3d 859, 867 (Fed. Cir. 2008) ("Failure to identify conduct that underlies the sanctions order is reversible error, as a matter of law.")

Leave to file the motion is requested per the ruling requiring “prior Board permission.”

Respectfully submitted,

30 DEC 2015

~ S ~ /Charles L. Thomason/

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Attorney for Respondent-Registrant

CERTIFICATE OF SERVICE

I hereby certify that on this 30th day of December, 2015, I electronically filed the foregoing Notice of Motion, and mailed a copy to the attorneys for the Petitioner, directed to the address of the attorney indicated below:

Nicole M. Murray, Esq.
Quarles & Brady LLP
300 N. LaSalle St., Suite 4000
Chicago, IL 60654

Date: 30 DEC 2015

~ S ~ /Charles L. Thomason/
Charles L. Thomason